

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RYAN SAWYERS, )  
                        )  
                        )  
*Plaintiff,*       )  
                        )  
                        )  
v.                     )                      Case No. 1:22-cv-00667  
                        )                      (CMH/IDD)  
PRINCE WILLIAM COUNTY SCHOOL     )  
BOARD, *et al.*,        )  
                        )  
*Defendants.*        )

**PLAINTIFF'S FED. R. CIV. P. 26(a)(3) FINAL DISCLOSURES FOR TRIAL**

COMES NOW Plaintiff, Ryan Sawyers ("Sawyers"), by counsel, pursuant to Fed. R. Civ. P. 26(a)(3) and this Court's Orders of December 2, 2022, and April 11, 2023, and identifies his witnesses and exhibits for trial. Plaintiff reserves the right to present other witness testimony by deposition should any witness become unavailable to testify at trial in person.

**I. NAME OF EACH WITNESS PLAINTIFF EXPECTS TO CALL:**

**Witnesses Plaintiff expects to call (F.R.C.P. 26(a)(3)(A)(i):**

1. Ryan Sawyers
2. Dr. Michael Bishop
3. Dr. LaTanya McDade
4. Dr. Carol Flenard (as corporate designee of Prince William County School Board)
5. Justin Wilk
6. Michelle Fair Kincaid
7. Dr. Babur Lateef
8. Ms. Diana Gulotta

9. Mary McGowan
10. Soledad Araya
11. Custodian of Records for Prince William County School Board

**II. NAME OF EACH WITNESS WHO MAY BE CALLED:**  
**F.R.C.P. 26(a)(3)(A)(ii):**

1. Wade Anderson
2. Guy Morgan
3. Dr. Steven Walts
4. Carla Drew
5. Matthew Guilfoyle
6. Karla Tilgner
7. All witnesses identified by Defendant Prince William County School Board to whom Plaintiff does not object.
8. All witnesses identified by Defendant Michael Bishop to whom Plaintiff does not object.
9. Rebuttal and impeachment witnesses who need not be identified.

**III. DESIGNATION OF WITNESSES WHOSE TESTIMONY IS EXPECTED TO OR MAY BE PRESENTED BY DEPOSITION**

1. Dr. Carol Flenard (as corporate designee of Prince William County School Board)

**IV. IDENTIFICATION OF EACH DOCUMENT OR OTHER EXHIBIT:**  
**F.R.C.P. 26(a)(3)(A)(iii):**

Plaintiff submits the following lists of exhibits that it may offer at trial. Plaintiff reserves the right to offer additional exhibits, including documents identified by either Defendant to which Plaintiff does not object and documents used strictly for impeachment or rebuttal purposes, which need not be specifically identified under F.R.C.P. 26(a)(3)(A)(iii).

| Ex. # | Description   | ID | Admitted |
|-------|---|----|----------|
| 1     | Screen Capture of @PioneersPHS from Ryan Sawyers' Twitter login<br>RS000333 |    |          |

|    |   |  |  |
|----|---|--|--|
| 2  | Screen Capture of @PioneersPHS without Twitter login<br>RS000334  |  |  |
| 3  | Screen Capture of @PioneersPHS without Twitter login<br>RS000388  |  |  |
| 4  | Screen Capture of @PioneersPHS from Ryan Sawyers' Twitter login<br>RS000337   |  |  |
| 5  | Screen Capture of @PioneersPHS from Ryan Sawyers' Twitter login<br>RS000336   |  |  |
| 6  | Video of scrolling through Twitter Feed without login<br>RS000453   |  |  |
| 7  | Screen capture of baseball search term on @PioneersPHS feed<br>RS000342   |  |  |
| 8  | Email correspondence between Ryan Sawyers & Soledad Araya<br>RS000330-RS000332  |  |  |
| 9  | Email correspondence between Ryan Sawyers & Soledad Araya<br>RS000467-RS000469  |  |  |
| 10 | Answers to Requests for Admissions filed by Michael Bishop in Case No. CL19-7101<br><u>RS001179-RS001184</u>                |  |  |
| 11 | Archived Electronic Copy of Twitter Account BISHOP 000084   |  |  |
| 12 | Screen captures from Twitter Account BISHOP 000001-BISHOP 000004  |  |  |
| 13 | Screen captures from Twitter Account BISHOP 000005-BISHOP 000013  |  |  |
| 14 | Screen captures from Twitter Account BISHOP 000014-BISHOP 000015  |  |  |
| 15 | Communication Guidelines Document dated January 21, 2021 BISHOP 000016-BISHOP 000055  |  |  |
| 16 | Screen captures of PWCSB training modules BISHOP 000056-BISHOP 000060   |  |  |
| 17 | PWCS Human Resources Regulation 503.02-1 BISHOP 000079-BISHOP 000083  |  |  |
| 18 | Plaintiff's Rule 30(b)(6) Notice of Deposition to PWCSB   |  |  |
| 19 | Prince William County School Board's Objections and Responses to Plaintiff Ryan Sawyers' First Set of Interrogatories       |  |  |
| 20 | Regulation 910-1 adopted September 25, 2019<br>PWCSB010306-PWCSB010307  |  |  |
| 21 | Defendant Michael Bishop's Answers & Objections to Plaintiff Ryan Sawyers First Interrogatories to Defendant Michael Bishop |  |  |
| 22 | Policy/Regulation Justification for Regulation 910-1<br>PWCSB010308-PWCSB010312   |  |  |
| 23 | Communication Guidelines Slide Deck<br>PWCSB007509-PWCSB007550  |  |  |
| 24 | Email correspondence between Diana Gulotta and Carol Marchant<br>PWCSB008161  |  |  |
| 25 | Email correspondence between Karla Tilgner and Marcia Jeans<br>PWCSB0071  |  |  |
| 26 | Regulation 503-1<br>PWCSB00013831-PWCSB00013834   |  |  |
| 27 | Performance Review of Dr. Michael Bishop<br>PWCSB00015832-PWCSB00015833   |  |  |
| 28 | Email correspondence between Michael Bishop & PWCS Parent<br>PWCSB000945-PWCSB000947  |  |  |

|    |  |  |  |
|----|--|--|--|
| 29 | Slide Deck for Incoming Freshmen<br>PWCSB000043-PWCSB000046                                |  |  |
| 30 | Email correspondence between Michael Bishop & Wade Anderson<br>PWCSB000927-PWCSB000928     |  |  |
| 31 | Formal Complaint re Social Media Use<br>PWCSB000373-PWCSB000379                            |  |  |
| 32 | Memorandum to School Board<br>PWCSB008645-PWCSB008647                                      |  |  |
| 33 | Q&A re Hot Topics<br>PWCSB010160-PWCSB010166   |  |  |
| 34 | Email correspondence between Soledad Araya and Michelle Kincaid<br>PWCSB000720-PWCSB000724 |  |  |
| 35 | Email correspondence between Soledad Araya and Michelle Kincaid<br>PWCSB000906-PWCSB000908 |  |  |
| 36 | @PioneersPHS Twitter Profile   |  |  |
| 37 | Email correspondence between Soledad Araya and Guy Morgan                                  |  |  |
| 38 | Email correspondence between Soledad Araya and Guy Morgan                                  |  |  |
| 39 | Diana Gulotta Tweet @PioneersPHS   |  |  |
| 40 | Tremblay & Smith bills for legal services<br>SAWYERS-001987-SAWYERS-002013                 |  |  |
| 41 | Tremblay & Smith summary of expenses<br>SAWYERS-0001986                                    |  |  |
| 42 | CarltonFields bills for legal services<br>SAWYERS-001959-SAWYERS-001985                    |  |  |

**RYAN SAWYERS**

BY COUNSEL

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was sent via ECF this 21st day of April, 2023, to the following:

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